

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW JERSEY

-----x Docket No.:
3:24-cv-09172-MAS-RLS

KEVIN BEASELY and KEVIN BEASLEY
STUDIO, LLC,

Plaintiffs,

AFFIDAVIT IN REPLY

-against-

MICHAEL FANELLI,

Defendant.

-----x
STATE OF NEW JERSEY)
) ss.
COUNTY OF MONMOUTH)

VINCENT FANELLI, being duly sworn, deposes and says:

1. I am the son of the Defendant in this action, Michael Fanelli. At all relevant times herein, I lived at 1 Denise Court, Manalapan, New Jersey 07726, with my father, Michael Fanelli. We were, and remain, the only two people who live at our house.

2. I understand that the process server claims that he attempted service at my house three times: October 22, 2024, October 28, 2024, and October 29, 2024. On October 22 I was the only person at home for the entire day. On that date, I never saw or spoke to anybody attempting to serve my father with legal papers. The doorbell never rang, and I never heard anybody knock on the door. I can confirm that although the Plaintiffs claim otherwise, the doorbell at my house was and remains inoperable. Any claims that the doorbell was rung by a process server or anyone else are categorically untrue.

3. On October 28, 2024, the second date of alleged attempted service, I was at work from

8:00 A.M. until 7:00 P.M. When I was home on that date, I never saw or spoke to anybody attempting to serve my father with legal papers. I also never heard anybody knocking on the door.

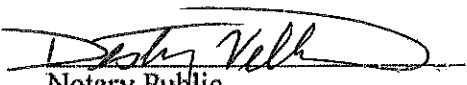
4. On October 29, 2024, the third date of alleged attempted service, I was home with my father in the morning. He then left at some point in the early afternoon. When I was home on that date, I never saw or spoke to anybody attempting to serve my father with legal papers. I also never heard anybody knocking on the door.

5. On October 29, 2024, at approximately 2:00 P.M., I left my home. I returned in the early evening, and did not encounter anybody attempting to serve my father legal papers at the house. However, after I parked my car, I noticed some papers lying at the foot of the driveway. I want to emphasize that although it is claimed otherwise, the papers were not posted to the door. I picked up the papers and brought them inside. After bringing them inside, I saw my father's name on the documents. I immediately contacted him to notify him that I had found legal papers in our driveway with his name on them.


VINCENT FANELLI

Sworn to before me this

4th day of March, 2025


Notary Public

HC: ab
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